

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

SEAGEN INC.,

*Plaintiff,*

v.

DAIICHI SANKYO CO., LTD.,

*Defendant,*

ASTRAZENECA PHARMACEUTICALS LP, and  
ASTRAZENECA UK LTD,

*Intervenor-Defendants.*

Civil Action No. 2:20-CV-00337-JRG

**JOINT MOTION TO AMEND PROTECTIVE ORDER**

Plaintiff Seagen Inc. (“Seagen”) and Defendants Daiichi Sankyo Company, Limited (“Daiichi Sankyo Japan”), AstraZeneca Pharmaceuticals LP, and AstraZeneca UK Ltd. (collectively “the Parties”) respectfully submit this Joint Motion to Amend the Protective Order.

The Parties have met and conferred, and respectfully request that the Court modify Paragraph 6(c) as shown below.

- (c) in-house counsel for the Parties who either have responsibility for making decisions dealing directly with the litigation of this Action, or who are assisting outside counsel in the litigation of this Action, **as well as Arthur Mann, Nobu Kodama, Patricia Barbieri, and Seth Flaum of Daiichi Sankyo, Inc., each of whom have responsibility for making decisions dealing directly with the litigation of this Action and assisting outside counsel in the litigation of this Action and have signed the Undertaking set forth in Appendix A;**

The attached Proposed First Amended Protective Order includes this language.

Dated: December 16, 2021

Respectfully Submitted,

By: /s/ Matthew A. Chivvis

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**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 16th day of December 2021, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Preston K. Ratliff II

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirement via email in Local Rule CV-7(h) regarding this Motion on December 16, 2021. The Parties are in agreement and are seeking joint relief.

/s/ Preston K. Ratliff II